

EXHIBIT B

1 THE UNITED STATES DISTRICT COURT
2
3 WESTERN DISTRICT OF WASHINGTON AT TACOMA

4 CHAO CHEN, individually and) No. 3:17-cv-05769-RJB
5 on behalf of all those)
6 similarly situated,)
7 Plaintiff,)
8 v.)
9 THE GEO GROUP, INC., a)
Florida corporation,)
10 Defendant.)

11 VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF
12 **NWAUZOR UGOCHUKWU**
13 June 19, 2018
Fircrest, Washington

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23 Taken Before:
24 Laura A. Gjuka, CCR #2057
25 Certified Shorthand Reporter

A P P E A R A N C E S

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1 my language. what I'm doing, like, learning. It's not
2 my language.

3 Q Okay.

4 A Yeah.

5 Q So you got into the United States -- you waited in a
6 long line, you got into the United States and you
7 requested asylum, correct?

8 A Yeah.

9 Q okay. Do you understand that the Department of Homeland
10 Security had to check you out to make sure you were not
11 a threat to the United States, correct?

12 A I believe.

13 Q okay. And so while you were seeking asylum, they put
14 you in a detention center, correct?

15 A Yes.

16 Q You were in the custody of Department of Homeland
17 Security, right? ICE, Immigration and Customs
18 Enforcement, correct?

19 A Yeah.

20 Q okay. And they placed you at Northwest Detention
21 Center, correct?

22 A Yes, sir.

23 Q Were you at any other locations other than Northwest
24 Detention Center?

25 A Yeah, in California. I spent some weeks in California

1 you provided three meals a day?

2 A Yeah.

3 Q All right. Were you provided clothing?

4 A Yeah.

5 Q Were you provided medical care whenever you needed it?

6 A Yeah.

7 Q Did you ever need medical care?

8 A When I need, I go.

9 Q Okay.

10 A Yeah.

11 Q And did you ever need it?

12 A Yeah. I was when I have the dentist.

13 Q Okay. So you also went and got dental care when you
14 were at Northwest Detention Center?

15 A Yeah. Yeah.

16 Q Okay. What was wrong with your teeth?

17 A I was having bleeding.

18 Q Bleeding?

19 A Yeah.

20 Q And what did they do for you?

21 A They give me some, you know -- some mouthwash and, you
22 know, that's -- and they check my teeth with the
23 machine, you know. Try to see if something is wrong,
24 you know.

25 Q Did they take x-rays of your teeth?

1 A Yeah. There was a time they called me, when I have an
2 appointment, like make me kind of, you know, check, you
3 know. Yeah.

4 Q Were you seen by a dentist? A dentist?

5 A Yeah, a doctor.

6 Q Okay. A doctor. Okay. All right.

7 Other than -- how many times did you go to the
8 doctor for your -- your teeth?

9 A Yeah. If -- they told me they're going to -- try to
10 clean bottom of my teeth because they didn't clean it.
11 They give me appointment, but before the appointment I
12 left the detention.

13 Q Okay. So you had another appointment but you were
14 released from --

15 A Yeah. When I release through the help of World Relief,
16 I did it. Yeah.

17 Q Did you understand that while you were seeking asylum
18 from the United States, that the United States held you
19 in custody until you got asylum?

20 MR. BERGER: Objection. calls for a legal
21 conclusion. You can go ahead and answer.

22 BY MR. DEACON:

23 Q Do you know if ICE was holding you at Northwest
24 Detention Center?

25 A I know that I fall in the hand of America.